

EXHIBIT G

In the Matter of:

Amazon eCommerce

September 27, 2022

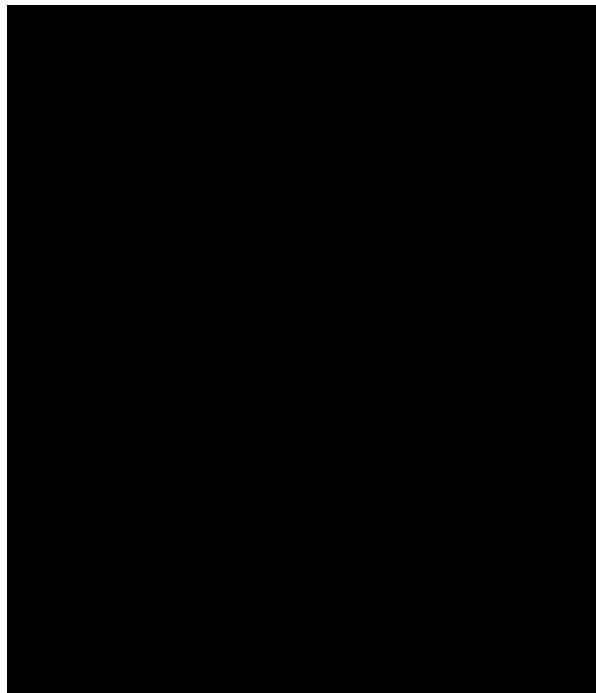
Jeff Blackburn

Condensed Transcript with Word Index



For The Record, Inc.
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Q You can put that document aside.

MS. BOLLES: I know this has been going an hour, but I do need a top off on

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there?

A Jeff Bezos. His security team asked a few of us if we could start to communicate that way rather than text.

Q And you said a few of you, was that the S-Team?

A I can't remember if it was S-Team or his direct reports, but it was some senior group, yeah.

Q Do you recall who on Mr. Bezos' security team asked you to begin using Signal?

A No.

Q How big is his security team?

A The security team is a pretty big team. There's a group -- I'm talking in the past -- was responsible for his office and that group is maybe four or five people.

Q Do you still use Signal for work today?

A No.

Q Are you familiar with Signal's disappearing message feature?

A Yes.

Q Have you ever used Signal's disappearing message feature on messages about

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water, is everybody okay?

MS. WILKINSON: Sure.

(Brief recess.)

BY MS. BOLLES:

Q We've seen reference to "JBlack" all one word in the documents.

A Yes.

Q Is that you?

A Yes.

Q Mr. Blackburn, are you familiar with an app called Signal?

A Yes.

Q What is Signal?

A It's a messaging app that's kind of more secure than texting.

Q Have you ever used Signal for work?

A Yes.

Q When did you begin using Signal for work?

A I started -- it's the beginning of 2019, around there. It was related to Jeff. He likes security and wanting us to have a more secure way to text.

Q And which Jeff are you referencing

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work?

A No.

Q And just to be clear, when I say "use," I mean whether or not you turned on the disappearing message feature, if it was on, that's what I mean by "use"; is that fair?

A Yes, but I didn't use it a lot. I mean, I literally had a few different people that I would use it with. And then it's not like a primary way that I was communicating or anything like that in the company. And I wasn't, like, very familiar with those functions that you're discussing. I only later learned that, you know, these are -- about all that functionality.

MS. WILKINSON: You're talking about your use of Signal, generally.

THE WITNESS: Yes.

MS. WILKINSON: She was asking about just the function. But you're saying you didn't even use Signal.

THE WITNESS: I used it just for the messaging application. I later on learned that there's a lot more functionality to it and that was after I

	205		207
1	had come back to the company.	1	Signal about work?
2	BY MS. BOLLES:	2	A Jeff Bezos, Andy Jassy,
3	Q So you learned about the	3	Mike Hopkins, Jen Salke. Probably a few of my
4	disappearing message feature after you came	4	other direct reports. Maybe Steve Boom. Maybe
5	back to the company?	5	my finance leader. But it's a group of roughly
6	A Yes.	6	that size. I could probably count them on one
7	Q Just to be clear, prior to leaving	7	hand or two.
8	the company, did you use the disappearing	8	Q Have you ever communicated about
9	message feature on Signal messages?	9	Prime Video on Signal?
10	A I think it's default on.	10	A Probably.
11	Q So might you have?	11	Q Have you ever had the disappearing
12	A I didn't use it.	12	message feature turned on when discussing
13	Q Might you have used the	13	Prime Video?
14	disappearing message feature?	14	A No, not that I know of.
15	A I mean, I don't know.	15	Q Have you communicated about
16	Q Did you receive any formal or	16	business strategy on Signal?
17	informal instructions on how to use Signal?	17	A Perhaps. It's not something I
18	A I was told at a certain point by	18	would typically do. It's mainly meant for
19	our legal team to change.	19	short messages and our longer communications
20	MS. WILKINSON: You don't want to	20	are all, as you've seen in the documents
21	reveal privileged information. All you	21	obviously, you have e-mail in our documents and
22	can say is --	22	things like that. But I may have. I can't say
23	THE WITNESS: -- I was told by our	23	that I have definitively, but I haven't talked
24	legal.	24	about strategy on Signal. I might have.
25	MS. WILKINSON: -- to take certain	25	Q Have you ever had the disappearing
	206		208
1	actions.	1	message feature turned on when discussing
2	BY MS. BOLLES:	2	business strategy on Signal?
3	Q Other than from your legal team or	3	A I don't know. I'm not -- like I
4	counsel, did you receive any formal or informal	4	was saying, I'm not really familiar with that
5	instructions on how to use Signal?	5	or I wasn't when I was using Signal.
6	A No.	6	Q Have you communicated about
7	Q Did you receive any instruction	7	potential or actual acquisitions on Signal?
8	from Mr. Bezos' security team as to how to use	8	A I don't know.
9	it?	9	Q What topics would you typically
10	A No.	10	communicate about on Signal?
11	Q To your knowledge, does Amazon	11	A Typically, it would be things like
12	have a policy about Signal usage by employees?	12	can you do a call later today? Can you do this
13	A Well, the legal team put out --	13	meeting? What did you think of that? Should
14	that's the only thing.	14	we have another conversation? Do we need a
15	Q So that's the only policy that	15	further review of X or Y. You know, that's
16	applied to Signal was from your legal counsel?	16	what I remember using it for.
17	A I don't know if it's a policy	17	Q Why did you want to use an
18	even. It was just guidance on Signal.	18	encrypted messaging app to have those
19	Q Have you asked anyone else to use	19	communications?
20	Signal for work?	20	A I didn't want to. I didn't want
21	A Maybe people just in -- maybe	21	to. I was fine using text and e-mail. It
22	certain people that work closely in a group	22	happened. And Jeff had this incident -- I
23	with Jeff, I might have, yes. But I don't	23	don't really know what happened actually, but I
24	remember specifically doing that.	24	suspect that it was because of a hack or
25	Q Who have you communicated with on	25	something that happened to him, we were asked

<p>1 to use a more secure messaging system. I 2 understood, and I used it. 3 Q Did you ever manually delete 4 messages from Signal? 5 A Not that I remember, no. 6 Q Other than the use of the 7 disappearing message feature or by manually 8 deleting Signal messages, have you retained all 9 of your messages on Signal? 10 A Yes. I mean, I don't use it any 11 longer, as I said. I copied my phone. You've 12 got all the information. It's all there. So 13 you know everything. 14 Q I understand you no longer use it, 15 did you delete the app off your phone? 16 A It's not on my current phone. I 17 have a new phone. 18 Q When did you upgrade your phone? 19 A I don't know. 20 Q Is it the iPhone 14? 21 A Yes. 22 Q So after that came out you 23 upgraded your phone? 24 A I don't know. 25 Q I'm just trying to get a ballpark.</p>	<p>1 They have it all. They did it multiple times. 2 Q Who did you give your phone to? 3 A A lawyer. 4 Q Was it one of your lawyers here 5 today? Just the name of the lawyer, none of 6 the content of the communications. 7 A I don't know who it was. My 8 assistant did it. 9 Q Do you recall the dates of the 10 Signal message collections? 11 MS. WILKINSON: I'm going to 12 object. I don't think he even knows what 13 that means when you say "collections" 14 because it's something the lawyers do. 15 MS. BOLLES: I think we were just 16 talking about when Signal messages were 17 collected off his phone. My question is 18 what dates was that. 19 THE WITNESS: I don't know when 20 that was. 21 BY MS. BOLLES: 22 Q Do you recall the years or year? 23 A There's some things that lawyers 24 were handling so you'd have to ask them. They 25 would know.</p>
<p>1 Was it the last month, the last week? 2 A It wasn't in the last month or 3 last week, no. 4 Q Last six months? 5 A Sometime in the last 12 months, I 6 would say. 7 Q Do you need an account to use 8 Signal? 9 A I don't know. I think so, yes. 10 Yes, you have to have some way to have your 11 name, so there has to be some kind of account. 12 Q Do you know if you still have a 13 Signal account? 14 A I don't know. I don't use it. 15 Q Amazon collected Signal messages 16 off your phone, right? 17 A Yes. 18 Q Do you recall if that was during 19 the MGM second request? 20 A I don't recall. I know there were 21 multiple times that it was done and we provided 22 my phone both times for as long as you wanted, 23 and you got it. So I don't know -- I don't 24 know anything about how that works. All I know 25 is someone took my phone. They took all of it.</p>	<p>210 212 1 Q Do you know if Amazon also took a 2 forensic image of your phone? 3 A I believe they did, yeah. I was 4 told that that's the way it works and I know 5 that it happened multiple times, but that's all 6 I know. 7 Q Do you know why it happened 8 multiple times? 9 A No. 10 Q Did Amazon also forensically image 11 your company-issued laptop in connection with 12 this matter? 13 A I think so. But I'm not sure. 14 Q Did you have to relinquish your 15 laptop at that time? 16 A I did, but my assistant would have 17 just done it. 18 Q Who is your assistant? 19 A Sharon Signorelli. 20 Q Do you know if Amazon collected 21 your personal e-mails from Outlook or e-mail 22 for this matter? 23 A I don't know. 24 Q I'm going to hand you Plaintiff's 25 Exhibit 1585.</p>

<p>1 (Copy of text messages was marked 2 PX1585 for identification.) 3 BY MS. BOLLES: 4 Q Have you reviewed the document? 5 A Yeah. 6 Q Do you recognize this document? 7 A It looks like messages, text 8 messages between myself and Jen Salke. 9 Q Do you see at the bottom it says 10 "You set disappearing message time to one 11 week"? 12 A Yes. 13 Q Does that indicate that these are 14 Signal messages? 15 A I don't know. You would know. I 16 think so. I don't know what it looks like. I 17 don't remember what the UI looks like for 18 Signal. That doesn't look like Apple texting 19 to me. 20 Q And do you have a disappearing 21 message function on your text messages? 22 A No. But there's many different 23 messaging apps. I use the Wickr one now. 24 Q Other than Wickr and Signal and 25 text message, have you used any other messaging</p>	<p>1 model." 2 Do you see that? 3 A Yes. 4 Q What does that mean? 5 A It means that some of this -- in 6 our estimation of what -- some of this older 7 intellectual property like Creed or Rocky or 8 Bond was probably more valuable to us than kind 9 of our finance team was thinking. 10 Q And why is that? 11 A Because new ideas come along and 12 ways to create new projects that we -- that the 13 modelers don't think about. Like, for example, 14 here it looks like there's opportunity around a 15 game for James Bond. That would not be 16 something that you would capture in that model. 17 It's a new opportunity. That's my opportunity. 18 I'm just stating it here. It's kind of a 19 texting thing. 20 Q After that message was sent, 21 that's where it says "You set disappearing 22 message time to one week," right? 23 A I don't know what that is. 24 Q So you don't recall setting the 25 disappearing message time in May of 2021?</p>
<p>1 apps for work? 2 A No. 3 Q So it appears that you are 4 messaging with Jennifer Salke; is that right? 5 A That's what this looks like, yes. 6 Q And then at the top it says 7 "JBlack and Mike." 8 Do you see that? 9 A Yes. 10 Q Do you know who Mike is? 11 A That's probably Mike Hopkins. 12 Q There are two dates on the screen. 13 One is Monday, May 24, and one is July 13. 14 Can you confirm the year of these 15 messages? My understanding is that it is 2021, 16 but I would like to know if you agree with 17 that. 18 A Okay. Yeah, this is very shortly 19 after I came back to the company. 20 Q And was that in 2021? 21 A Yes. 22 Q At the bottom of the screen, you 23 write, "Thumbs up emoji. Jim Freeman, was 24 good, kind of what you've been saying all 25 along, old IP, more valuable to PV versus</p>	<p>1 A No. 2 Q Do you recall if you continued to 3 discuss with Miss Salke and Mr. Hopkins 4 Prime Video on Signal? 5 A I don't know that we did very 6 much. I don't remember doing it very much, no. 7 I mean, if we did, it was only in a very 8 limited way. 9 Q At the bottom of the screen it 10 says "Tuesday, July 13," but then it's cut off. 11 Do you recall if anything happened 12 on Tuesday, July 13, 2021, on Signal? 13 A No. 14 Q I'm going to hand you what's been 15 marked as PX1586. 16 (Copy of text messages was marked 17 PX1586 for identification.) 18 Q Have you had a chance to review 19 the document? 20 A Yeah. 21 Q This document at the top says 22 "MHJS." 23 Do you see that? 24 A Yes. 25 Q Is that Mike Hopkins,</p>

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1 **Jennifer Salke?**

2 A I think so.

3 Q **Do you see the date at the top**
4 **says "Tuesday, July 13"?**

5 A Yes.

6 Q **My understanding is that the year**
7 **is 2021, but does that sound right based on the**
8 **context of this document?**9 A I don't know. I don't have this
10 information.11 Q **This says "On Tuesday, July 13,**
12 **you disabled disappearing messages."**13 **Do you see that?**

14 A Yes.

15 Q **Do you recall disabling**
16 **disappearing messages on July 13?**17 A No, but I know that I did at some
18 point.19 Q **You did at some point disable**
20 **disappearing messages?**

21 A Yes.

22 Q **Was that after you learned about**
23 **the disappearing message functionality?**24 A Yes. Someone explained how it
25 worked.

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1 said. I didn't say that I didn't recall doing
2 it, I don't recall the date. I got guidance
3 from our legal department, and I made the
4 change. And I think that happened more than
5 one time, so -- and I did what they told me to
6 do.7 Q **By "more than one time," do you**
8 **mean like on multiple threads?**9 A No. No. There is at least one
10 time period. There may have been two. They
11 said, This has this functionality in it. You
12 need to turn it off.13 MS. WILKINSON: Okay. You can't
14 say more. You can say you received
15 guidance on several occasions and after
16 that you turned it off.

17 Is that fair?

18 THE WITNESS: Yes. I think that's
19 what you're seeing here.

20 BY MS. BOLLES:

21 Q **Did you receive a document**
22 **preservation notice in this matter?**

23 A I don't know.

24 Q **Do you know if you're currently**
25 **under a document preservation notice in this**

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1 Q **And was that when you came back to**
2 **Amazon in 2021?**3 A I don't remember when it was
4 exactly, the timing of that.5 Q **Was it after you came back to**
6 **Amazon?**

7 A So this is like --

8 MS. WILKINSON: I think --

9 THE WITNESS: My lawyers have
10 talked to me about this stuff.11 MS. WILKINSON: Can we consult off
12 the record for a moment?13 MS. BOLLES: Yes, and if you want
14 to step outside, that's fine.15 MS. WILKINSON: Let's step
16 outside.

17 (Brief recess.)

18 BY MS. BOLLES:

19 Q **I think we established before we**
20 **took a short break that you did not recall**
21 **disabling disappearing messages on July 13; is**
22 **that right?**23 I might have that wrong so please
24 correct me if I'm wrong.

25 A I don't recall the date is what I

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1 **matter?**

2 A Yes, I am.

3 Q **When did that begin?**

4 A I don't know.

5 Q **How do you know that you're**
6 **under -- I want to be clear.**7 A I don't know what this matter is
8 for. There's multiple things going on here.
9 There's many, many different matters for which
10 I get document preservation notices, so I can't
11 tell you specifically. When you say "for this
12 matter," the best way to answer is I don't
13 know. Yes, am I aware that I get document
14 preservation notices, yes, I am.15 Q **Did you receive a document**
16 **preservation notice in connection with the MGM**
17 **matter?**

18 A Yes.

19 Q **Did you receive a document**
20 **preservation notice in connection with any**
21 **other FTC investigations?**

22 A I believe I have, yes.

23 Q **Do you recall when that was?**

24 A No.

25 Q **I want to be clear that I'm not**

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<p>1 asking for your advice of counsel, the 2 boundaries that we've drawn today.</p> <p>3 What was your understanding of 4 whether Signal messages were covered by the 5 document preservation notices?</p> <p>6 MS. WILKINSON: I'm going to 7 object because I think it's -- if I could 8 assist, give him a timeframe because 9 you're saying -- I think it's -- that 10 could affect the privilege issue. So if 11 you could make it a little more specific, 12 if you can, go ahead. He may or may not 13 be able to answer.</p> <p>14 MS. BOLLES: That's fair.</p> <p>15 BY MS. BOLLES:</p> <p>16 Q At the time that you received the 17 document preservation notices, did you 18 understand whether Signal messages were covered 19 by them?</p> <p>20 A I did not.</p> <p>21 Q Did you ever learn that Signal 22 messages were or were not covered by the 23 document preservation notices?</p> <p>24 A Again, that would be something I 25 discussed with lawyers.</p>	<p>1 object here. When you say "this matter," 2 there's multiple matters.</p> <p>3 BY MS. BOLLES:</p> <p>4 Q Do you understand the matter that 5 I'm referring to?</p> <p>6 A No, I don't really know what 7 you're getting at.</p> <p>8 Q Do you understand that in addition 9 to the MGM matter there is another FTC 10 investigation?</p> <p>11 A Yes.</p> <p>12 Q Do you understand that you've been 13 subpoenaed here today to testify as part of an 14 FTC investigation?</p> <p>15 A Yes.</p> <p>16 Q Do you feel confident that you 17 understand the scope of your document 18 preservation obligations pursuant to this FTC 19 investigation?</p> <p>20 A I think I understand them in a 21 general way. I don't know how specifically you 22 would want my understanding to be, the depth of 23 that.</p> <p>24 MS. WILKINSON: And there's 25 multiple investigations. You're implying</p>
<p>222</p> <p>1 MS. BOLLES: A yes-or-no answer is 2 all I'm looking for.</p> <p>3 MS. WILKINSON: He said that's 4 something I discussed with lawyers.</p> <p>5 MS. BOLLES: So is that a yes?</p> <p>6 MS. WILKINSON: You can say yes.</p> <p>7 THE WITNESS: Yes.</p> <p>8 MS. WILKINSON: Then you just have 9 to say yes.</p> <p>10 THE WITNESS: Yes. What am I 11 supposed to say?</p> <p>12 MS. WILKINSON: It's something 13 lawyers focus on and we sometimes think 14 people that aren't lawyers remember a lot 15 more of the details than they do. No 16 problem, you just tell her what you 17 remember and what you don't.</p> <p>18 BY MS. BOLLES:</p> <p>19 Q I'm just looking for a yes or no 20 on this. I'm not trying to get into the 21 contents.</p> <p>22 Did you receive any additional 23 training in document retention in connection 24 with this matter?</p> <p>25 MS. WILKINSON: I'm going to</p>	<p>224</p> <p>1 just two, sadly for Amazon, there's more 2 than that.</p> <p>3 BY MS. BOLLES:</p> <p>4 Q Did you receive additional 5 training on document retention in connection 6 with FTC investigations?</p> <p>7 MS. WILKINSON: Again, I'm going 8 to object. Additional training? I don't 9 know that you established he received any 10 training. I believe he told you he 11 received legal guidance.</p> <p>12 BY MS. BOLLES:</p> <p>13 Q Did you receive training on 14 document retention in connection with FTC 15 investigations?</p> <p>16 A I received legal guidance, e-mails 17 to me.</p> <p>18 Q Did you ever receive a training?</p> <p>19 A What do you mean by "a training"?</p> <p>20 Q I'm just trying to establish -- 21 you testified that you had e-mail guidance. 22 Was there anything else?</p> <p>23 A No.</p> <p>24 MS. WILKINSON: I'm going to 25 object. If you're going to start asking</p>

<p>1 about what the training is you're going 2 to get into -- 3 MS. BOLLES: I'm asking about 4 whether the training existed, that's all. 5 MS. WILKINSON: Again, he asked 6 you what it was. He told you he received 7 legal guidance and he said one of the 8 ways was through e-mail. 9 MS. BOLLES: Yes. What format was 10 the legal guidance given in? Was it only 11 via e-mail? 12 MS. WILKINSON: If you've got 13 multiple formats you can say multiple. 14 Did you speak to lawyers face-to-face as 15 well as receive e-mails. 16 THE WITNESS: E-mail and 17 conversation. 18 BY MS. BOLLES: 19 Q Who was the conversation with? 20 I'm not asking about the contents of the 21 conversation, just the name of the person it 22 was with. 23 MS. WILKINSON: You can say the 24 name if you can remember, if it was one 25 or more people.</p>	<p>225</p> <p>1 A No. And, again, I received legal 2 guidance that that was a secure messaging app, 3 and we're using it. 4 Q Have you ever asked anyone you 5 work with to use Wickr? 6 A I don't know. Maybe. 7 Q Who do you communicate with on 8 Wickr? 9 A Andy Jassy, Jeff Bezos. Some of 10 my direct reports. 11 Q How frequently do you use Wickr? 12 A A couple times a week. 13 Q Have you ever messaged about 14 Prime Video using Wickr? 15 A I don't think so. But I may have. 16 Q What about discussing business 17 strategy, have you discussed business strategy 18 on Wickr? 19 A It depends what you mean by 20 "business strategy." 21 Q I'm happy to defer to your 22 definition. 23 A Like I said, it's not kind of a 24 substantial, in-depth conversations, but every 25 now and then something does come up and there's</p>
<p>226</p> <p>1 THE WITNESS: I remember talking 2 to Kelly Jo McArthur. 3 BY MS. BOLLES: 4 Q And is that an Amazon attorney? 5 A Yes. 6 Q Do you recall when you spoke with 7 them? 8 A No. 9 Q I believe you mentioned Wickr in 10 your testimony earlier. 11 What is Wickr? 12 A It's an Amazon messaging app. 13 Q Is it also encrypted? 14 A Yes. It's secure, similar to the 15 ways Signal was. 16 Q Does it have an auto delete 17 feature? 18 A I don't know. 19 Q Have you used Wickr for work? 20 A Yes, but only lightly and kind of 21 the same way, just a handful of people. I 22 don't use it for longer topics or business 23 decisions or things like that. 24 Q Do you recall the date you started 25 using Wickr?</p>	<p>228</p> <p>1 emergency issues or urgent issues or something 2 like that and it does relate to business, so it 3 does happen. It's not the primary method. 4 Q Do you still use Wickr for work 5 today? 6 A Yes. 7 Q Have you retained all of your 8 messages about work on Wickr? 9 MS. WILKINSON: I don't think he 10 has an obligation to retain all of his 11 messages on Wickr. You're asking about 12 everything he does. Even with all the 13 investigations going on, I don't think 14 everything he does is -- he's required 15 to, so if you could stick to what you 16 were, which is -- I'm not sure he could 17 answer it, that could be responsive to 18 the investigations and maybe he keeps 19 them, but I don't want the implication 20 that he has to retain every message. 21 MS. BOLLES: I'm not implying 22 anything. 23 MS. WILKINSON: I know you're not. 24 I want the record to be clear that that's 25 not what you're focusing on. I think</p>
<p>1 about what the training is you're going 2 to get into -- 3 MS. BOLLES: I'm asking about 4 whether the training existed, that's all. 5 MS. WILKINSON: Again, he asked 6 you what it was. He told you he received 7 legal guidance and he said one of the 8 ways was through e-mail. 9 MS. BOLLES: Yes. What format was 10 the legal guidance given in? Was it only 11 via e-mail? 12 MS. WILKINSON: If you've got 13 multiple formats you can say multiple. 14 Did you speak to lawyers face-to-face as 15 well as receive e-mails. 16 THE WITNESS: E-mail and 17 conversation. 18 BY MS. BOLLES: 19 Q Who was the conversation with? 20 I'm not asking about the contents of the 21 conversation, just the name of the person it 22 was with. 23 MS. WILKINSON: You can say the 24 name if you can remember, if it was one 25 or more people.</p>	<p>225</p> <p>1 A No. And, again, I received legal 2 guidance that that was a secure messaging app, 3 and we're using it. 4 Q Have you ever asked anyone you 5 work with to use Wickr? 6 A I don't know. Maybe. 7 Q Who do you communicate with on 8 Wickr? 9 A Andy Jassy, Jeff Bezos. Some of 10 my direct reports. 11 Q How frequently do you use Wickr? 12 A A couple times a week. 13 Q Have you ever messaged about 14 Prime Video using Wickr? 15 A I don't think so. But I may have. 16 Q What about discussing business 17 strategy, have you discussed business strategy 18 on Wickr? 19 A It depends what you mean by 20 "business strategy." 21 Q I'm happy to defer to your 22 definition. 23 A Like I said, it's not kind of a 24 substantial, in-depth conversations, but every 25 now and then something does come up and there's</p>
<p>226</p> <p>1 THE WITNESS: I remember talking 2 to Kelly Jo McArthur. 3 BY MS. BOLLES: 4 Q And is that an Amazon attorney? 5 A Yes. 6 Q Do you recall when you spoke with 7 them? 8 A No. 9 Q I believe you mentioned Wickr in 10 your testimony earlier. 11 What is Wickr? 12 A It's an Amazon messaging app. 13 Q Is it also encrypted? 14 A Yes. It's secure, similar to the 15 ways Signal was. 16 Q Does it have an auto delete 17 feature? 18 A I don't know. 19 Q Have you used Wickr for work? 20 A Yes, but only lightly and kind of 21 the same way, just a handful of people. I 22 don't use it for longer topics or business 23 decisions or things like that. 24 Q Do you recall the date you started 25 using Wickr?</p>	<p>228</p> <p>1 emergency issues or urgent issues or something 2 like that and it does relate to business, so it 3 does happen. It's not the primary method. 4 Q Do you still use Wickr for work 5 today? 6 A Yes. 7 Q Have you retained all of your 8 messages about work on Wickr? 9 MS. WILKINSON: I don't think he 10 has an obligation to retain all of his 11 messages on Wickr. You're asking about 12 everything he does. Even with all the 13 investigations going on, I don't think 14 everything he does is -- he's required 15 to, so if you could stick to what you 16 were, which is -- I'm not sure he could 17 answer it, that could be responsive to 18 the investigations and maybe he keeps 19 them, but I don't want the implication 20 that he has to retain every message. 21 MS. BOLLES: I'm not implying 22 anything. 23 MS. WILKINSON: I know you're not. 24 I want the record to be clear that that's 25 not what you're focusing on. I think</p>

<p style="text-align: right;">229</p> <p>1 you're focusing on that he's required to 2 retain. 3 MS. BOLLES: Sure. And I'm happy 4 to parse that later with you, but for 5 now, Mr. Blackburn, have you retained all 6 of your messages about work on Wickr? 7 THE WITNESS: I believe that I 8 have, yes. 9 BY MS. BOLLES: 10 Q Have you ever used Slack for work? 11 A The Twitch team uses Slack. We 12 had a security incident with Twitch and at that 13 time I needed to use it with them. But that's 14 the only time that I was using it. 15 Q And do you recall when that was? 16 A The Twitch security problem was 17 last fall some time, November or October a year 18 ago. 19 Q 2021? 20 A Yes. 21 Q Do you still use Slack with the 22 Twitch team? 23 A No. 24 Q How frequently did the Twitch team 25 use Slack when it was in use?</p>	<p style="text-align: right;">231</p> <p>1 A Nope. 2 Q What about Telegram? 3 A No. 4 Q I believe you testified earlier 5 that you had used text messages for work; is 6 that right? 7 A Uh-huh. 8 Q What was the purpose of using text 9 messages for work? 10 A Well, it just -- it's not that I 11 want to, just that it -- it's kind of how when 12 you're working very closely with people, it's 13 just something that's done. I try very much to 14 not have it be my work thing. I don't want it 15 to be, but external people, our relationships 16 with external people, they use it so then it 17 starts to blend that way. 18 Q Do you recall having deleted 19 work-related texts? 20 A No. 21 Q When you transferred phones, did 22 they pull over your text messages? 23 A I think so, yeah. 24 Q When you transferred phones, did 25 anyone at Amazon assist you with the switch?</p>
<p style="text-align: right;">230</p> <p>1 A Well, you know, it was an 2 emergency-type event, so we were using it many 3 times a day for a few weeks. 4 Q You said "a few weeks"? 5 A Yeah. 6 Q Do you know if you can share 7 documents via Slack? 8 A I don't know. You can share a 9 link to a document, a Cloud document. So 10 that's what they would do. 11 Q Do you still have -- or let me ask 12 this, did you use Slack on your computer or on 13 your phone? 14 A I used it on my phone. 15 Q Was there an app that you had to 16 download to use it? 17 A Yes. 18 Q Do you still have that app on your 19 phone? 20 A I might. I'm not sure. It 21 depends when I got the new phone. But I 22 think -- I might. I don't use it, so -- but it 23 might be on there. 24 Q Have you ever used WhatsApp for 25 work?</p>	<p style="text-align: right;">232</p> <p>1 A I think our IT department made 2 sure all of the apps that I was using were 3 refreshed, yes. 4 MS. BOLLES: I will take a short 5 break and -- actually, let's go off the 6 record. 7 (Brief recess.) 8 MS. BOLLES: Mr. Blackburn, I have 9 no further questions for you today. 10 Thank you so much for your time. 11 MS. WILKINSON: We can go off the 12 record. 13 The deposition was concluded at 14 5:37 p.m.</p>